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The Federal Communications Commission
Office of the Secretary
445 12th St S.W.
Room TWB 204
Washington, D.C. 20554
Re: Docket 95-25

Gentlemen:

I wish to make comment on the recently considered Engineering Service rules for new Low Power FM Systems MM Docket 95-25. My primary Interest is in the "microradio" class, of the one to ten watt range services.

I am a Licensed Pyrotechnic Operator in Texas who shoots professional fireworks displays, as well as being President of The Pyrotechnic Artists of Texas, a fireworks club consisting of 120 persons who shoot fireworks in professional as well as private not-for-profit club presentations. There are 14 other fireworks clubs such as ours in the United States, the largest being the Pyrotechnics Guild International, with a membership of 3000 persons.

"Microradio" transmission of our set-to-music fireworks presentations could offer us freedom from Public address system use, to the degree that our firing crews may control the progress of our musically accompanied presentations, from the firing lines, without having unnecessary wiring, nor speakers to encumber us. The audience simply uses an FM radio, or the program could be put on a PA system tied to an FM tuner receiving the broadcast itself, for larger audiences.

Other applications of fireworks Microradio broadcast would allow us to transmit our programs from a firing location on a barge situated in a lake or river, or from a tall building in a city location, such as is currently done in Houston, Texas in September at the "Power of Houston" display. Fireworks are also displayed on islands that would otherwise prohibit the use of wire line services, and it would be necessary to coordinate the display by perhaps cellular phone communications with the shore based point of announcer for the program. Microradio would then be preferable to this, as the program could easily be paused for any reason, at the will of the shooting crew, and as such could provide a margin of safety for all involved in the presentation.

Fireworks club presentations seldom run more than one to two hours, and many times these club sponsored Not-for-Profit events are done in remote locations where adjacent broadcasters are unaffected by such transmissions.

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Professional broadcasts on the other hand, may involve closer proximity adjacent channel situations, in a more band crowded, city atmosphere. But again, such transmissions seldom exceed one to two hours in length.

There is interest by many in the fireworks trades in microradio, but being involved in the explosives sector of the community, under constant scrutiny by the public, we are all concerned with being able to properly license, or permit, any such broadcasts we do, and we all want to remain legal in doing any such ventures.

Your consideration on providing such a license or permit, for us to do this would be appreciated by all in the trade. Ideally, such a permit would be inexpensive for Not-For-Profit Corporations such as ours, as we already pay a fortune for other permits and insurance to do what our membership is able to do.

Microradio systems of up to 10 watts in radiated power would be very sufficient for our uses, as we seldom need more than perhaps two miles coverage, unless a very large scale public event were planned, that was spread out over a wide area. In that case coverage by a commercial broadcaster would most likely be utilized. Fireworks clubs have no need for the broadcasting of commercial announcements for monetary gains, but the professional sector may have such as needed by their promoters. However, I am personally speaking from the perspective of a club leader, who is familiar with some of the professional requirements, and cannot speak for all their needs.

Thank you so much for the opportunity to express my concerns of this subject.

Sincerely,



Kenneth J .Barton -President, C.E.O
The Pyrotechnic Artists of Texas Inc.
Licensed Texas Pyrotechnic Operator

Member: Florida Pyrotechnics Arts Guild,
Western Pyrotechnics Association,
Pyrotechnics Guild International,
National Fireworks Association

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